



Washington Nonprofit Corporation

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4 June, 1999

Thomas Ferns
U.S. Dept. of Energy
Richland Operations Office
P. O. Box 550, MSIN HO-12
Richland WA 99352

Dear Mr. Ferns:

Seattle Audubon Society wishes to go on record as favoring Alternative One of the Revised Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan (HRA EIS) and provides the following comments in support:

1. All of the public lands of the Hanford Reservation, outside of the nuclear and processing and storage areas, comprise a large, unique, relatively undisturbed shrub-steppe environment. As such it harbors and protects many native species both rare and at risk elsewhere, and some listed species.
2. The reservation provides a baseline against which to measure other, more degraded shrub-steppe habitat and provides unusually good research opportunities.
3. Alternative One prohibits agriculture, mining, grazing and intensive recreational use that would compromise the ecological and wildlife values present there. The Reservation provides resting and staging areas for migratory neotropical bird species as well as habitat for resident species which would be displaced or reduced by intensive development. Mining, except for cleanup and remediation of contaminated sites, would degrade habitat unacceptably.
4. The Hanford Reach provides the last remaining spawning beds for the Columbia River population of Fall Chinook salmon and must be left undisturbed.
5. The Reach also provides for low-intensity recreational opportunities such as rafting and kayaking that do not harm fish or other wildlife.
6. The Wahluke Slope and the White Cliffs are very unstable. The addition of irrigation water could cause severe slumping and erosion, adding to the sediment burden of the river and loss of valuable habitat.

Therefore, we propose that all public lands comprising the Wahluke Slope, the Hanford Reach and its islands, the Arid Lands Ecology reserve, and the McGee Ranch be designated as National Wildlife Refuge and be added to the existing National Wildlife Refuge. We support the use of these lands by the tribes for cultural and ceremonial activities, provided that these activities are restricted to tribal members and no permanent modifications or additions are made to the land.

We are completely opposed to Alternative Three.

We believe that a separate Record of Decision (ROD) should be issued for all of the areas mentioned above, that would be placed in a Conservation status. This would serve to protect

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these areas now while decisions are being made in regard to cleanup and remediation of the weapons manufacturing portions of the Reservation. The latter may require years or decades to complete.

Sincerely,

A handwritten signature in cursive script that reads "Chuck Lennox".

Chuck Lennox
Conservation Chair
Member, Board of Directors